

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case:2:11-cr-20089
Judge: Borman, Paul D
MJ: Majzoub, Mona K
Filed: 02-17-2011 At 04:40 PM
INDI: USA V. SEALED MATTER (KB)

D-1 RICHARD BANJOH,
a.k.a. "Peter Showbawale," & "Tyson,"

Defendant.

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE
(21 U.S.C. § 952)
Importation of Heroin

D-1 RICHARD BANJOH, a.k.a. "Peter Showbawale," & "Tyson"

On or about June 24, 2008, the defendant, RICHARD BANJOH, did intentionally and knowingly import from the country of Dubai, United Arab Emirates into the United States, Eastern District of Michigan, Southern Division, 100 grams or more of a mixture and substance containing a detectable amount of Heroin, a Schedule I controlled substance, all in violation of Title 21, United States Code Sections 952 and 960.

COUNT TWO
(21 U.S.C. §§ 952 & 846)
Conspiracy to Import Heroin

D-1 RICHARD BANJOH, a.k.a. "Peter Showbawale," & "Tyson"

On or about April 12, 2010 through April 19, 2010, the defendant, RICHARD BANJOH, did knowingly, intentionally and unlawfully conspire, combine, confederate and agree, with each

other and other persons, whose names are both known and unknown to the grand jury, to commit an offense against the United States, that is, to intentionally and knowingly import from the country of Pakistan into the United States, Eastern District of Michigan, Southern Division, 200 grams or more of a mixture and substance containing a detectable amount of Heroin, a Schedule I controlled substance, all in violation of Title 21, United States Code Sections 952 and 960; and Title 21, United States Code Section 846.

Pursuant to Title 21, United States Code, Section 841(b)(1)(B)(i), it is further alleged that this violation involved 200 grams or more of a mixture or substance which contains Heroin, a Schedule I controlled substance.

THIS IS A TRUE BILL.

s/Grand Jury Foreperson
GRAND JURY FOREPERSON

BARBARA L. MCQUADE
United States Attorney

s/Terrence R. Haugabook
TERRENCE R. HAUGABOOK
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Dated: February 17, 2011

ORIGINAL

United States District Court
Eastern District of Michigan

Criminal Case Cover Sheet

Case Number

NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information		Companion Case Number:
This may be a companion case based upon LCrR 57.10(b)(4) ¹ :		Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		AUSA's Initials: TRH <i>TRH</i>

Case Title: USA v. Richard Banjoh

County where offense occurred : Macomb

Check One: Felony Misdemeanor Petty

Indictment/ _____ Information --- no prior complaint.
 Indictment/ _____ Information --- based upon prior complaint [Case number:]
 Indictment/ _____ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information:

Superseding to Case No: _____

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Original case was terminated; no additional charges or defendants.
 Corrects errors; no additional charges or defendants.
 Involves, for plea purposes, different charges or adds counts.
 Embraces same subject matter but adds the additional defendants or charges below:

Defendant nameChargesPrior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

February 17, 2011

Date



TERRENCE R. HAUGABOOK

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Attorney Bar #: P-44554

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.